Industry Perspective: IP-71111.11 Gregg Ludlam - Exelon Chuck Sizemore - NextEra **History and Background** • Over 10 years of IP-71111.11 experience and understanding · NOT new, NOT unknown to industry · Industry strongly agrees with new focus on Operator performance vs. just program performance · Aligns with INPO/industry focus on Operator fundamentals **Industry Insights** · Inspections are more comprehensive and targeted - Indicates inspectors are looking deeper, may be uncovering latent issues - Utilities are having to adjust to new guidance not previously found in IP or regulation · Off-year inspection activities are new - Not currently time consuming, but could be - Resident inspector training on the licensed operator requalification (LOR) program · Many details in new version are not found any where else - INPO ACAD 07-001 guides LOR program - Example: remediation requirements, scenario LOD - May bypass SAT processes, force station procedure changes

Closing Industry recognizes value in shift in process Industry has interest in how requirements found in the IP and no where else will be enforced Questions? Gregg Ludlam gregg.ludlam@exeloncorp.com (610) 765-5648 Chuck Sizemore charles.sizemore@fpl.com (561) 691-2188

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